### EXHIBIT M3

### WATER QUALITY MANAGEMENT PERMIT FOR THE EAST GOSHEN MUNICIPAL AUTHORITY WASTEWATER TREATMENT PLANT



#### Pennsylvania Department of Environmental Protection

#### 2 East Main Street Norristown, PA 19401 August 5, 2008

**Southeast Regional Office** 

Phone: 484-250-5970 Fax: 484-250-5971

Mr. Louis F. Smith, Manager East Goshen Township 1580 Paoli Pike West Chester, PA 19380

Re: Ridley Creek STP Upgrades

Sewerage 1502404
File Type: Permit
East Goshen Township
Chester County

Dear Mr. Smith:

Your permit is enclosed.

You must comply with all Standard and Special Conditions attached to this permit. Construction must be done in accordance with the permit application and all supporting documentation. Please review the permit conditions and the supporting documentation submitted with your application before starting construction.

Enclosed is the "Sewage and Industrial Wastewater Facilities Construction Certification" form. A Pennsylvania-registered Professional Engineer must sign and complete this form prior to startup of the facilities (see Special Conditions). You or your authorized representative must also sign the form. This certification and other post-construction documentation must be submitted to the Department within 30 days following startup of the facilities.

Any person aggrieved by this action may appeal, pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. Section 7514, and the Administrative Agency Law, 2 Pa.C.S. Chapter 5A, to the Environmental Hearing Board, Second Floor, Rachel Carson State Office Building, 400 Market Street, P.O. Box 8457, Harrisburg, PA 17105-8457, 717-787-3483. TDD users may contact the Board through the Pennsylvania Relay Service, 800-654-5984. Appeals must be filed with the Environmental Hearing Board within 30 days of receipt of written notice of this action unless the appropriate statute provides a different time period. Copies of the appeal form and the Board's rules of practice and procedure may be obtained from the Board. The appeal form and the Board's rules of practice and procedure are also available in braille or on audiotape from the Secretary to the Board at 717-787-3483. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

Mr. Louis F. Smith, Manager

- 2 -

IF YOU WANT TO CHALLENGE THIS ACTION, YOUR APPEAL MUST REACH THE BOARD WITHIN 30 DAYS. YOU DO NOT NEED A LAWYER TO FILE AN APPEAL WITH THE BOARD.

IMPORTANT LEGAL RIGHTS ARE AT STAKE, HOWEVER, SO YOU SHOULD SHOW THIS DOCUMENT TO A LAWYER AT ONCE. IF YOU CANNOT AFFORD A LAWYER, YOU MAY QUALIFY FOR FREE PRO BONO REPRESENTATION. CALL THE SECRETARY TO THE BOARD (717-787-3483) FOR MORE INFORMATION.

If you have any questions, please call Mr. David Talley at 484-250-5181.

Sincerely,

Jenifer Fields, P.E. Regional Manager Water Management

#### **Enclosures**

cc:

Mr. Andrews - Pennoni Association

Operations Section

Mr. Sheckler

Re (GJE08WQ)196-10A

3800-PM-WSWM0015 Rev. 6/2004 Permit



## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WATER SUPPLY AND WASTEWATER MANAGEMENT

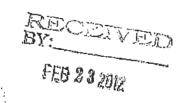
## WATER QUALITY MANAGEMENT PERMIT

PERMIT NO. <u>1502404</u>
MENDMENT NO
APS ID 638484
MITH ID 714190

A.	PERMITTEE (Name and Address): East Goshen Township Municipa 1580 Paoli Poke West Chester, PA 19380	B. PRIMARY FACIL Ridley Creek S	` '			
C.	E. LOCATION (Municipality, County):  East Goshen Township  Chester County			SITE ID#: 256818		
D.	This permit approves the modifi	ication of sewerage facilit	ies consis	sting of:		
	-The following upgrades to the fa	acility to increase capacit	y to 0.750	mgd:		
	- New influent grinder with			disinfection system	A- P-st FO	
	<ul> <li>New influent lift station</li> <li>New 4 tank SBR systems</li> </ul>			on of existing clarifi R equipment buildi		
	<ul> <li>New rotary disc filters</li> </ul>	•		trifuge to replace be		
	<ul> <li>Conversion of existing aer aerobic sludge digesters</li> </ul>	ation tanks to				
Pum	p Stations:	Manure Storage:		Industrial Was	tewater/Sewage Trea	tment Facility:
	gn Capacity: GPM	-		Annual Average Flow:	-	MGD
1	age Annual Flow: GPD	Volume	MG	Design Hydraulic Cap		MGD
		Freeboard:	inches	Design Organic Capac	eity: <b>2,098</b>	lb/day
E.	APPROVAL GRANTED BY THIS PERM	L MIT IS SUBJECT TO THE FO	LLOWING:			
1.						
	Amendments: All construction, operations, and procedures shall be in accordance with the Water Quality Management Permit Amendment application dated and its supporting documentation, and addendums dated, which are hereby made a part of this amendment.					
	Except for any herein approved modifications, all terms, conditions, supporting documentation and addendums approved under Water Quality Management Permit No dated shall remain in effect.					
	<b>Transfers:</b> Water Quality Management Permit No dated and conditions, supporting documentation and addendums are also made part of this transfer.					
2.	Permit Conditions Relating to sewerage are attached and made part of this permit.					
3.	Special Conditions numbered are attached and made part of this permit.					
F.	. THE AUTHORITY GRANTED BY THIS PERMIT IS SUBJECT TO THE FOLLOWING FURTHER QUALIFICATIONS:					
1.	. If there is a conflict between the application or its supporting documents and amendments and the attached conditions, the attached conditions shall apply.					
2.	by the issuance of this permit.					
3.	3. This permit is issued pursuant to the Clean Streams Law Act of June 22, 1937, P.L. 1987, as amended 35 P.S. §691.1 et seq. Issuance of this permit shall not relieve the permittee of any responsibility under any other law.					
PER	MIT ISSUED:			ву:	- Fulls	ξ
	August 5, 200	08		TITLE: Water	Management Progra	am Manager







FEB 232m7

February 21, 2012

Mr. Louis F. Smith, Jr.
Township Manager
East Goshen Municipal Authority
1580 Paoli Pike
West Chester, PA 19380

Re:

Ridley Creek STP

Applebrook Golf Course

Sewage Renewal Application No. 1500410 A1

File Type: WQM Permit East Goshen Township

Chester County

Dear Mr. Smith:

Your permit is enclosed.

You must comply with all Standard and Special Conditions attached to this permit.

We would like to bring your attention to the Department's new electronic Discharge Monitoring Report (eDMR) program. The program can be accessed through the Internet at www.dep.state.pa.us/edmr and can be used in lieu of paper DMR submissions. Please find enclosed additional information concerning eDMR. We highly encourage your participation in this program.

Any person aggrieved by this action may appeal, pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. Section 7514, and the Administrative Agency Law, 2 Pa.C.S. Chapter 5A, to the Environmental Hearing Board, Second Floor, Rachel Carson State Office Building, 400 Market Street, P.O. Box 8457, Harrisburg, PA 17105-8457, 717.787.3483. TDD users may contact the Board through the Pennsylvania Relay Service, 800.654.5984. Appeals must be filed with the Environmental Hearing Board within 30 days of receipt of written notice of this action unless the appropriate statute provides a different time period. Copies of the appeal form and the Board's rules of practice and procedure may be obtained from the Board. The appeal form and the Board's rules of practice and procedure are also available in braille or on audiotape from the Secretary to the Board at 717.787.3483. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

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If you have any questions, please call Ms. Karen McDaniel at 484.250.5126.

Sincerely,

Jenifer Fields, P.E. Regional Manager Water Management

#### Enclosures

cc: East Goshen Township

Chester County Health Department

Mr. Semanchik - Pennoni Associates, Inc.

Ms. McDaniel, PADEP - SERO

Operations Section

Ms. Lashley

Re 30 (joh11wqn1)363-3

3800-PM-WSWM0015 Rev. 6/2004 Permit

### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WATER SUPPLY AND WASTEWATER MANAGEMENT



## WATER QUALITY MANAGEMENT PERMIT

PERMIT NO. <u>1500410</u>

AMENDMENT NO. <u>1</u>

<u>Renewal</u>

APS ID <u>752003</u>

				11	AUTH ID 883096	
A.	PERMITTEE (Name and Address): <b>East Goshen Municipal Authori</b> 1580 Paoli Pike  West Chester, PA 19380	CLIENT 1D#; <b>626</b> <b>y</b>		B. PRIMARY FACILITY (Na Ridley Creek STP - ( Spray Irrigation S	Applebrook Golf Course	
C.	LOCATION (Municipality, County): East Goshen Township Chester County			SITE ID#; 256818		
D.	D. This permit approves the renewal of sewerage facilities consisting of: 135,000 gpd of diverted, treated effluent from Ridley Creek Sewage Treatment Plant to a 5-million-gallon lagoon (pond) on the golf course. The treated effluent is disposed of by spray irrigation onto 60 acres of the golf course.					
Pum	p Stations;	Manure Storage:		Indusţrial Wastewater/	Sewage Treatment Facility:	
Desi	gn Capacity: GPM			Annual Average Flow:	0.135 MGD	
Avei	age Annual Flow: GPD	Volume	MG	Design Hydraulic Capacity:	0.135 MGD	
		Freeboard:	inches	Design Organic Capacity:	lb/day	
1. 2. 3.	Amendments: All construction, operations, and procedures shall be in accordance with the Water Quality Management Permit Amendment application dated and its supporting documentation, and addendums dated, which are hereby made a part of this amendment.  Except for any herein approved modifications, all terms, conditions, supporting documentation and addendums approved under Water Quality Management Permit No dated shall remain in effect.  Transfers: Water Quality Management Permit No dated and conditions, supporting documentation and addendums are also made part of this transfer.  Permit Conditions Relating to Sewerage are attached and made part of this permit.					
1. 2. 3.	If there is a conflict between the application or its supporting documents and amendments and the attached conditions, the attached conditions shall apply.  Failure to comply with the rules and regulations of DEP or with the terms or conditions of this permit shall void the authority given to the permittee by the issuance of this permit.					
PERMIT ISSUED: February 21, 2012			BY: Water Management Program Manager			

# Sewerage Permit No. 1500410 East Goshen Municipal Authority East Goshen Township, Chester County

#### This permit is subject to the following Special Condition(s):

#### I. Groundwater Monitoring Requirements

The permittee shall effectively monitor the quality of the groundwater. The parameters to be tested and frequency of analysis and other monitoring requirements shall be as follows:

- Quarterly analysis of groundwater sampled at groundwater monitoring wells MW-1, MW-2, and MW-3 shall consist of: static water level, sampling depth, turbidity, pH, chloride, total phosphates, ammonia nitrogen, nitrate nitrogen, nitrite nitrogen, total dissolved solids, fecal coliform, and alkalinity.
- All groundwater monitoring wells shall be properly purged prior to collection of the groundwater sample.
- All groundwater samples shall be collected from within the top five feet of the water elevation within the well column.

#### II. Groundwater Monitoring Data Reporting Requirements

All groundwater data shall be submitted to the Department of Environmental Protection (Department) annually and be in report form. The report shall be due to the Department within 28 days of the end of your annual permit cycle. For example, if your permit was issued on March 4, 2008, then your Annual Report is due by April 28, 2009. The Annual Report shall be mailed under separate cover and addressed to:

Department of Environmental Protection Southeast Regional Office Water Management Program 2 East Main Street Norristown, PA 19401

Attention: Hydrogeologist Planning Section

The annual groundwater monitoring report shall include the following information:

- 1. General Information
  - A. Facility name
  - B. Facility permit number
  - C. Facility location (including municipality and county)

#### D. Facility contact information:

- Permittee name, address, and telephone number
- Contact name and title
- Facility operator name, address, and telephone number
- Facility consultant name, address, and telephone number

#### 2. Site Information

- A. Brief narrative, including site limitations.
- B. Soil type and bedrock lithology beneath the absorption areas.
- C. Site drawings showing general location of absorption fields and monitoring wells. Drawings must show site topography.
- 3. Construction details of each groundwater monitoring well shall include:
  - A. Well depth.
  - B. Casing depth.
  - C. Static water levels.
  - D. Surface elevation.
  - E. Well log.
  - F. Water bearing zones.
  - G. Top of casing elevation.
  - H. Ground surface elevation.

#### Site History

- A. Date site 537 approval issued.
- B. Date site permit issued.
- C. Date groundwater monitoring began.
- D. Date treatment plant started operation.
- E. Date land application of treated wastewater started.
- F. Date of any additional permit actions and description of actions (e.g., waiver of special conditions or anything else which may impact content within this permit). Include copy of any correspondence in correspondence section.
- G. Date and description of any enforcement action.
- H. Date and description of any facility event which impacted any part of the facility, including the groundwater monitoring wells, whether or not it resulted in an enforcement action (e.g., irrigation pump failure, collapse of groundwater monitoring well, etc.).

#### Site Data

- A. Average effluent flow for the year covered by the report.
- B. In tabular form, the following information needs to be provided for at least the last 5 years of system operation:
  - i. Date of sampling.
  - ii. Groundwater elevation.
  - iii. Sampling depth.
  - iv. Identification of upgradient and downgradient wells.
  - v. The results of the analysis of the samples.
- C. Background groundwater data generated prior to system startup. This information is absolutely needed.
- 6. Correspondence

This section shall contain copies of correspondence with the Department relevant to system operations. Correspondence to be included is the following:

- A. Recent permit modifications or amendments.
- B. Any approvals related to facility operation.
- C. Enforcement actions, including NOVs.
- D. Any other correspondence pertinent to system operation.
- 7. Comprehensive Groundwater Evaluation (CGE)

As part of the facility's 5-year permit renewal application, the permittee shall submit a report that is a result of a comprehensive evaluation of the systems impact on groundwater. A Registered P.G. must identify any trends which may pose a threat to human health or certify that none are present. Should adverse impacts to groundwater be identified, the permittee needs to recommend actions to address the potential threat.

- III. Effective disinfection to control disease producing organisms shall be the production of an effluent which will contain a concentration not greater than 200/100 ml of Fecal Coliform organisms, as a geometric average value nor greater than 1,000/100 ml of these organisms in more than 10 percent of the samples tested.
- IV. If there is a change in ownership of this facility or in permittee name, an application for transfer of permit must be submitted to the Department.
- V. Copies of monthly Discharge Monitoring Reports must be submitted within 28 days of the end of the monitoring period to:

Department of Environmental Protection Southeast Regional Office Water Management 2 East Main Street Norristown, PA 19401

- VI. The water level, within the impoundments, shall be controlled so that a freeboard of at least 24 inches is maintained at all times.
- VII. Spray irrigation shall not occur on frozen soil or during prolonged or heavy rainfall events. Effluent may not be applied if more than 0.5 inches of rainfalls during the previous 24-hour period.
- VIII. If the effluent from the, herein approved, sewage treatment facilities creates a health hazard or nuisance, the permittee shall, upon notice from the Department, provide such additional treatment as may be required by the Department.

#### IV. Discharge Limitations and Monitoring Requirements

Effluent from the sewage treatment plant shall be sampled from the effluent port at the pump station and shall be limited at all times as follows:

	Discharge Limitations (mg/l)			Monitoring Requirements		
Parameter	Average Monthly	Average Weekly	Instantaneous Maximum	Measurement Frequency	Sample Type	
Flow (mgd)	0.135			Continuous	Recorded	
CBOD <sub>5</sub>	25	40	50	1/Month	8 Hour Composite	
Suspended Solids	30	45	60	1/Month	8 Hour Composite	
Fecal Coliform	200/100 ml as geometric average			1/Month	Grab	
рН	Within limits of 6.0 to 9.0 standard units at all times			1/Month	Grab	

<sup>\*</sup>Total Nitrogen = Total Kjeldahl Nitrogen + Nitrite (NO<sub>2</sub>) + Nitrate (NO<sub>3</sub>)

Additional treatment requirements include the satisfactory disposal of sludge and the reduction of quantities of oils, greases, acids, alkalis, toxic, taste, and odor producing substances, inimical to the public interest to levels which will not pollute the receiving waters. Monitoring results shall be reported monthly on the Discharge Monitoring Report (DMR). The term "composite" sample means a combination of individual samples collected at regular intervals over a time period. The term "grab" sample means an individual sample collected in less than 15 minutes. Samples and measurements taken as required, herein, shall be representative of the volume and nature of the monitored discharge.

- X. The authorization to discharge contained in Section C of this permit shall expire in 5 years from the date of issuance, or reissuance. Application for renewal of this permit, or notification of intent to cease discharging by the expiration date, must be submitted to the Department at least 180 days prior to the above expiration date (unless permission has been granted by the Department for submission at a later date). In the event that a timely and complete application for renewal has been submitted and the Department is unable, through no fault of the permittee, to reissue the permit before the above expiration date, the terms and conditions of this permit will be automatically continued and will remain fully effective and enforceable pending the grant or denial of the application for permit renewal. The application for renewal shall be submitted on the appropriate Water Quality Management Part II Application forms and shall include a tabulated summary of all groundwater monitoring data for the previous 5 years, including a discussion of groundwater quality trends resulting from this discharge.
- XI. Unless, otherwise, specified in this permit, the test procedures for analysis of pollutants shall be those contained in 40 C.F.R. Part 136, or alternative test procedures approved pursuant to that Part. For the analysis of CBOD<sub>5</sub>, consult Section 507 of Standard Methods.
- XII. Application of effluent shall be managed to prevent runoff of effluent from the permitted sprayfield and ponding of effluent in the spray area.

#### XIII. Sprayfield Hydraulic Loading Requirements

The recorded effluent flow to the Applebrook Golf Course must be consistent with the maximum hydraulic loading rates per week shown in the following table (the maximum hydraulic rates per week cannot be exceeded):

Month	Number of Spray Days	Application Rate Inches/Acre/Week	Maximum Hydraulic – Loading in Gallons per Week on 60 Acres of Wetted Golf Course Area
January	0		
February	0		
March	0		
April	27	0.6	945,000
May	31	0.6	945,000
June	30	0.6	945,000
July	31	0.6	945,000
August	31	0.6	945,000
September	30	0.6	945,000
October	31	0.6	945,000
November	0		
December	0		

At no time shall the application rate exceed 0.199-inch per hour for any spray area. The wastewater application shall be determined by the golf course manager based on turf conditions and best golf course management practices.

During drought emergency, the treated wastewater from the Ridley Creek sewage treatment plant for spray application shall be pumped directly to the wet well serving the spray pumps. The wastewater may be sprayed on greens, trees, fairways, and rough areas of the golf course.

XIV. If the permittee monitors any pollutant more frequently than the permit requires, the results of this monitoring shall be incorporated, as appropriate, into the calculations used to report self-monitoring data on the DMR.

#### XV. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

- 1. The exact place, date, and time of sampling or measurement.
- 2. The person(s) who performed the sampling or measurement.
- The dates the analyses were performed.
- 4. The person(s) who performed the analyses.
- 5. The analytical techniques or methods used.
- 6. The results of such analyses.

#### XVI. Recordkeeping and Retention

The permittee shall keep records of operation and efficiency of the wastewater treatment facilities. All records of monitoring activities and results (including all original strip chart recordings for continuous monitoring instrumentation and calibration and maintenance records), copies of all reports required by this permit, and records of all data used to complete the application for this permit shall be retained by the permittee for three (3) years. The three-year period shall be extended as requested by the Department.

XVII. Consistent with Department policy, the Department did not conduct a detailed technical review of the application for this permit. The Department considers the registered professional engineer whose seal is affixed to the design documents, to be fully responsible for the adequacy of all aspects of the facility design.

#### XVIII. Laboratory Certification

The Environmental Laboratory Accreditation Act of 2002 requires that all environmental laboratories register with the Department. An environmental laboratory is any facility engaged in the testing or analysis of environmental samples required by a statute administered by the Department relating to the protection of the environment or of public health, safety, and welfare.



#### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WATER STANDARDS AND FACILITY REGULATION

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) DISCHARGE MONITORING REPORT (DMR) . PRIMARY FACILITY: Ridley Creek STP 1500410-A1 Effluent Port @ Ridley Applebrook Golf Course - Site id. 256818 02-28-2017 Renewal Creek STP PERMIT EXPIRES: CLIENT: East Goshen Municipal Authority Client Id. 62683 PERMIT NUMBER DISCHARGE PERMIT APPLICATION DUE: 09-01-2016 ADDRESS: 1580 Paoli Pike MONITORING PERIOD WEST CHESTER, PA 19380 YEAR MO DAY TO YEAR MO DAY Check here if No Discharge MUNICIPALITY: East Goshen Township NOTE: Read instructions before completing this form COUNTY: Chester County QUANTITY OR LOADING OUALITY OR CONCENTRATION NO. FREQUENCY SAMPLE EΧ ОF TYPE ANALYSIS PARAMETER MONTHLY INST. MONTHLY **AVERAGE** WEEKLY MINIMUM AVERAGE AVERAGE UNITS AVERAGE UNITS WEEKLY Sample XXXX XXXX XXXX FLOW Measurement Permit MGD XXXX XXXX XXXX XXXX CONTINOUS METER XXXX Requirement .135 Sample XXXX PΗ Measurement XXXX XXXX Permit XXXX STD I/MONTH GRAB INITS Requirement 6.0 9.0 INST MAX Sample XXXX XXXX XXXX XXXX CBOD Measurement Permit Requirement XXXX XXXX XXXX 25 40 MG/L 1/MONTH SHC Sample XXXX XXXX TOTAL SUSPENDED Measurement XXXX SOLIDS Permit Requirement XXXX XXXX XXXX 30 45 MG/L 1/MONTH SHC Sample Measurement XXXX XXXX XXXX XXXX FECAL COLIFORM Permit Requirement XXXX XXXX XXXX 200 GEOMETRIC XXXX #COL/ 1/MONTH GRAB MEAN 100ML Sample Measurement Permit Requirement Sample Measurement Permit Requirement NAME/TITLE PRINCIPAL EXECUTIVE I certify under penalty of law that this document was prepared under my TELEPHONE DATE OFFICER direction or supervision in accordance with a system designed to assure that qualified personnel gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is,

SIGNATURE OF PRINCIPAL EXECUTIVE

OFFICER OR AUTHORIZED AGENT

AREA

CODE

NUMBER

YEAR

MO

DAY

COMMENTS (Report all violations on the "Non-Compliance Reporting Form")

TYPE OR PRINT

to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information. including the possibility of fine and imprisonment for knowing violations. See

18 Pa.C.S.A. § 4904 (relating to unsworn falsification).